

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GOAT FASHION LIMITED,

Plaintiff,

-against-

1661, INC.,

Defendant.
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Civil No. 19-CV-11045-PAE

**NOTICE OF MOTION
FOR A PRELIMINARY
INJUNCTION**

PLEASE TAKE NOTICE that, upon the annexed declaration of Jane Lewis, executed on the 19th day of March 2020, the declaration of Thomas A. Telesca, Esq. executed on the 23rd day of March 2020, and the exhibits annexed thereto, and the accompanying Memorandum of Law dated March 23, 2020, and all of the pleadings and proceedings heretofore had herein, Plaintiff Goat Fashion Limited, through its attorney Ruskin Moscou Faltischek, P.C., will move this Court before the Honorable Paul A. Engelmayer, U.S.D.J. at the United States District Court for the Southern District of New York, located at 40 Foley Square, Courtroom 2201, New York, New York 10007, on a date to be determined by the Court, for an Order, pursuant to Rule 65 of the Federal Rules of Civil Procedure, to preliminarily enjoin defendant 1661, Inc., and its employees, shareholders, agents, officers, directors, successors, affiliates, subsidiaries, and assigns, and all of those in active concert and participation with any of the foregoing persons and entities, during the pendency of this action, from manufacturing, distributing/providing, selling, marketing, advertising, promoting, offering for sale, selling, or authorizing any third party to manufacture, distribute/provide, offer for sale, sell, market, advertise or promote,

any clothing, apparel, clothing accessories, and/or any other related goods or services bearing Plaintiff's GOAT marks or any other mark that is a counterfeit, copy, simulation, confusingly similar variation, or colorable imitation of Plaintiff's GOAT marks (except in connection with an online marketplace for others to buy and sell "athletic and sporting footwear"), together with such other and further relief as the Court deems just and appropriate.

Dated: Uniondale, New York
March 23, 2020

RUSKIN MOSCOU FALTISCHEK, P.C.

By: /s/ Thomas A. Telesca
Thomas A. Telesca
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